August 11, 2003
Subject: Docket 03-104 (Broadband over Power Line)

Response to filings of the power industry:

As an licensed amateur radio operator for over 40 years and personally involved with emergency amateur radio and public service communications in rural West Texas for most of those years, I am very concerned with the potential impact that such a system will have on our ability communicate in times of emergency. Numerous comments have been filed by the power industry stating that there will be little significant RF leakage and interference to licensed operations. Their justification for these comments is non-existent and flies in the face of the many case studies and scientific studies that have been filed by other commenters. I would ask you to closely review the information filed by Mr. Ed Hare and the Amateur Radio Relay League. There is also a wealth of governmental research from Japan and several European countries that rebuts the opinion of the power line industry.

Industry comments would lead one to believe that BPL is the means to bring high-speed internet access to Rural America. As a selling point, the idea is excellent, but it does not meet the reality test. In sparsely settled areas of West Texas, where the power company speaks of "miles of line per customer", the cost makes it non-competitive with satellite down linked systems and totally impractical. In urban areas where the power company can speak of the number of "customers per pole" it can be very financially rewarding for the local power provider. This has nothing to do with bringing high-speed data-access to Rural America. It is a means to offer urban residents, most of whom already have high-speed digital alternatives, another alternative. This alternative will be at the expense of those of us who use that portion of the spectrum exclusively assigned to us by the FCC and other government agencies who utilize the spectrum for their benefit.

A significant portion of West Texas and rural America is served by rural electric cooperatives, usually known locally as the "co-op". They have done and continue to do a very good job of providing dependable power to their served areas on a very low budget. They often lack the financial ability or the expertise to adequately solve local electrical interference problems. BPL interference operating over a large amount of the spectrum and spread over a significant geographical area will be beyond their capabilities.

It has been demonstrated that BPL at existing Part 15 limits can cause significant harm to services operating within their Primary Frequency assignment. Any increase of power levels above Part 15 level will be detrimental to that service and to the general public.

Respectfully,

John Dyer
ARES County Emergency Coordinator
ARES District Emergency Coordinator
Extra Class Amateur Radio Operator AE5B